



GARY M. RESTAINO
United States Attorney
District of Arizona

GAYLE L. HELART
California State Bar No. 151861
Email: gayle.helart@usdoj.gov
JENNIFER E. LAGRANGE
California State Bar No. 238984
Email: jennifer.lagrange@usdoj.gov
Assistant United States Attorneys
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Telephone: 602-514-7500
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Tyler Alexander Sproule,
Defendant.

No. CR-22-00413-PHX-SPL (MTM)

**REDACTED
INDICTMENT**

VIO: 18 U.S.C. §§ 2252(a)(2), (b)(1),
and 2256
(Distribution of Child
Pornography)
Counts 1 - 3

18 U.S.C. § 981 and 2253,
21 U.S.C. § 853, and
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

THE GRAND JURY CHARGES:

COUNT 1 – 3

On or about the dates below, in the District of Arizona, and elsewhere, defendant TYLER ALEXANDER SPROULE did knowingly distribute a visual depiction that involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct. The visual depiction had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed,

shipped, and transported by any means, including by computer. Some of the visual depictions of minors engaged in sexually explicit conduct that were distributed are listed below:

Count	Date (on or about)	Distributed to	File(s)
1	March 1, 2021	An individual in Tennessee	IMG_4904.MP4 IMG_4905.MP4
2	March 3, 2021	An individual in Tennessee	IMG_4914.MP4 IMG_4916.MP4 IMG_4917.MP4 IMG_4918.MP4 IMG_4919.MP4 IMG_4920.MP4 IMG_4922.MP4 IMG_4925.MP4 IMG_4926.MP4 IMG_4927.MP4 IMG_4928.MP4
3	March 10-11, 2021	An individual in Tennessee	IMG_5014.MP4 IMG_5015.MP4 IMG_5017.JPG

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1), and 2256.

FORFEITURE ALLEGATIONS

The Grand Jury realleges and incorporates the allegations of Counts 1 through 3 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 18, United States Code, Sections 981 and 2253, Title 21 United States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction of the offenses alleged in Counts 1 through 3 of this Indictment, the defendant

1 shall forfeit to the United States of America all right, title, and interest in any visual
2 depiction, or any book, magazine, periodical, film, videotape, or other matter which
3 contains any such visual depiction, which was produced, transported, mailed, shipped or
4 received in violation of statute, and any property, real or personal, constituting or traceable
5 to gross profits or other proceeds obtained from such offense, and any property, real or
6 personal, used or intended to be used to commit or to promote the commission of such
7 offense or any property traceable to such property, including, but not limited to: (1)
8 Samsung Tablet, Model SM-T580, Serial Number R52K80TX09E; (2) ZTE cell phone,
9 Model Z2332CC, Serial Number 329F96640E4E, (3) Alcatel Cell phone with IMEI
10 015174005999426 with SanDisk SD card; all seized by Yuma Police Department on
11 approximately May 19, 2020; **and** (1) A Samsung Tablet; (2) Two photographs of
12 partially nude boys; and (3) A 4 GB San Disk SD card, all seized by Yuma Police
13 Department on approximately February 3, 2020; **and** (1) An AT&T prepaid phone with
14 IMEI 865638040996788 seized by Winterset Police Department, Winterset, Iowa, on or
15 about July 27, 2021, all items either containing visual depictions of minors engaging in
16 sexually explicit conduct and child erotica and /or used to facilitate child pornography
17 activities. If any of the above-described forfeitable property, as a result of any act or
18 omission of the defendant:

- 19 (1) cannot be located upon the exercise of due diligence,
- 20 (2) has been transferred or sold to, or deposited with, a third party,
- 21 (3) has been placed beyond the jurisdiction of the court,
- 22 (4) has been substantially diminished in value, or
- 23 (5) has been commingled with other property which cannot be divided without
24 difficulty,

25 it is the intent of the United States to seek forfeiture of any other property of said defendant
26 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. Section
27 853(p).
28

1 All in accordance with Title 18, United States Code, Sections 981 and 2253, Title
2 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c), and
3 Rule 32.2, Federal Rules of Criminal Procedure.

4 A TRUE BILL

5
6 s/
FOREPERSON OF THE GRAND JURY
Date: May 3, 2022

7
8 GARY M. RESTAINO
United States Attorney
District of Arizona
9

10 s/
GAYLE L. HELART
JENNIFER LAGRANGE
Assistant U.S. Attorneys
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28